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29 September 2015

Via ECF

Honorable Raymond J. Dearie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Leonid Momotok, et al.*  
15 Cr. 381 (RJD)

Dear Judge Dearie:

I have been retained to represent Mr. Momotok in the referenced indictment. On September 3, 2015, Mr. Momotok was arraigned (*See Doc. 29*) and an Order of Detention was then entered with leave to reapply. (*See Doc 30*). I am informed no bail package was presented at that time.

Since then, we have gathered pledged sureties of secured properties with documented equities totaling over \$500,000.00. I have discussed these equities with both Assistant United States Attorneys Christopher Ott and Chris Nasson. They are in agreement that the amount of equity is adequate. Mr. Nasson indicated they would request that if Mr. Momotok is released, he should be on home monitoring, with expenses borne by the defendant. We have no objection. We would request that exemptions allowing for Mr. Momotok to leave his home for medical reasons, appointments with counsel, employment, religious services and verifiable family obligations regarding his wife and four children apply.

I have been informed that Mr. Momotok, a naturalized American citizen, and a father of four young children, had his American & Ukrainian passports seized when he was arrested. He has been in custody since his arrest on August 11, 2015. We would respectfully request Your Honor to order EDNY Pre Trial Services to expeditiously begin their interviews of the sureties to commence the bail process and grant bail at the earliest possible date.

Thank you for your consideration.

Respectfully submitted,  
/s/ Linda Moreno  
Linda Moreno

cc: AUSA Christopher Allen Ott, *Via ECF*  
AUSA Chris Nasson, *Via ECF*  
PTSO, *Via ECF*